

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ERIKA LOPEZ, and all others similarly §
situated under 29 U.S.C. 216 (b), §
Plaintiff, §
§
§ Cause No. 3:12-cv-04604-BK
v. §
§
KIM C. YOUNG *also known as* §
YOUNG CHAE KIM *also known as* §
HYUN CHAE KIM *doing business as* §
WASH & PRESS COIN LAUNDRY §
also known as WASH N PRESS §
Defendant. §

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. Where do you work and for how long have you worked there?
2. Are you paid salary or hourly?
3. Do you work more than 40 hours weekly? If so, do you get paid overtime and minimum wages? If not, why not?
4. Do you believe that a private agreement between an employer and employee as to the amount of wages to be paid should override the law if the law holds that the private agreement is void?
5. Will you follow and apply the law 100% to the facts of the case even if your personal opinion conflicts with the law and even if you believe the law is not right?
6. Have you ever had a wage dispute with any employer? If so, were you satisfied with the results?
7. Do you believe that wage agreements should be in writing so that there is a clear

understanding as to how much hourly wages are to be paid to an employee?

8. Do you know what the Fair Labor Standards Act is? If so, how do you know this information?
9. Do you have any problem sitting in judgment over others due to personal beliefs of any nature?
10. Do you understand the difference between the burden of proof for a plaintiff to prevail in a civil claim versus the burden of proof in a criminal case?
11. Is there any question that should have been asked to you personally that would be necessary for us to know that you will be a fair juror?
12. Will you have any problem rendering a verdict against the Defendant if the Plaintiff proves her case?
13. Who do you believe should be responsible for maintaining records of hours worked and wages paid--- the employer or the employee?
14. Have you ever been a juror? If so, when and what type of case and were you able to reach a verdict? If not, why not?

Respectfully submitted,

By: /s/ Joshua A. Petersen
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel and parties of record by electronic service in accordance with the local rules of United States District Court for the Northern District of Texas, Dallas Division this 24th day of August, 2015.

/s/ Joshua A. Petersen
Joshua A. Petersen
Counsel for the Plaintiff(s)